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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Dongyan Wang,

Plaintiff,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of the Department of
Homeland Security; Tracy Renaud, Acting
Director, U.S. Citizenship and Immigration
Services; Clyde Moore, Field Office Director,
Las Vegas Field Office U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 2:21-cv-00837-RFB-EJY

**Joint Status Report and Stipulation to
Extend Stay 60 Days**

(Second Request)

Plaintiff Dongyan Wang and the United States of America, on behalf of Federal
Defendants Merrick Garland, Alejandro Mayorkas, Tracy Renaud, and Clyde Moore,
through counsel, hereby stipulate and agree as follows:

1. Plaintiff filed his Complaint on May 6, 2021.
2. Plaintiff served the United States with a copy of the Summons and
Complaint on October 27, 2021.
3. The deadline for Federal Defendants to answer or otherwise respond was
December 27, 2021.

1 4. On December 23, 2021, the parties stipulated and agreed that the United
2 States should have 14 additional days to file an answer or other responsive pleading on
3 behalf of Federal Defendants (ECF No. 9). The Court granted the extension on December
4 27, 2021, giving the United States until January 10, 2022 to answer or otherwise plead
5 (ECF No. 10).

6 5. Since the Court granted the extension, the parties have engaged in
7 discussions to resolve this case without further Court intervention. The parties stipulated
8 and agreed that Plaintiff's section 1447(b) claim should be withdrawn so as to allow
9 jurisdiction to return to the United States Citizenship and Immigration Services ("USCIS")
10 for review and adjudication of Plaintiff's N-400 Application for Naturalization (ECF No.
11 11). The parties further stipulated and agreed that the case should be held in abeyance until
12 such time as the USCIS has made a final determination as to Plaintiff's N-400 Application
13 for Naturalization (ECF No. 11). The Court granted the stipulation and ordered the parties
14 to file either a dismissal or a joint status report on or before April 11, 2022. *See* ECF No.
15 12.

16 6. In accordance with the Court's order, the parties hereby file this joint status
17 report. The parties continue work together toward resolution. However, the parties need 60
18 additional days to finalize resolution. Accordingly, the parties request that the Court
19 continue the stay of this matter pending resolution or final adjudication of the Plaintiff's N-
20 400 Application for Naturalization. If the parties are able to resolve this matter, they will
21 promptly file a stipulation of dismissal.

22 7. If the parties are unable to resolve this matter and the case is not dismissed,
23 the parties agree to file a joint status report 60 days after the entry of the Court's stay order.

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8. This stipulation is made in good faith and not for the purpose of delay.
Respectfully submitted this 11th day of April 2022.

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Peter L. Ashman
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 11th, 2022 _____